

Joshua Adam Schulte, *pro se*

April 26, 2022

BY HAND

Judge Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

RE: *United States v. Joshua Adam Schulte*, S3 17 Cr. 548 (JMF)

Dear Judge Furman:

I write the Court to introduce a new, minor, supplemental motion *in limine*. New information disclosed in the government's motions *in limine* trigger this supplement; it now appears the government intends to further mislead, confuse, and taint the jury regarding the "Schulte Articles." This Court should not allow the government to deliberately mislead, confuse, and taint the jury.

**THE COURT SHOULD PRECLUDE THE GOVERNMENT FROM REFERRING TO
DOCUMENTS AS "SCHULTE ARTICLES" OR "ARTICLES" WHEN THEY ARE NOT**

Mr. Schulte only referred to his unclassified Redress of Grievances as his "articles" (i.e. "Schulte Articles"). This is made abundantly clear in both the seized attorney-client privileged notebooks and the recorded prison phone calls. The government seeks to reference "The Email", "Malware of the Mind", and potentially other documents as "Schulte Articles" or "Articles." See, e.g. the government's Motions *in Limine*, Dkt. 780 at 20 (referring to "The Email" as "the Schulte Article"). The government's primary purpose is to mislead, confuse, and taint the jury. Since Mr. Schulte sought to publicly release his unclassified redress of grievances, he discussed this in phone calls and in his notebooks. The government now seeks to pervert the desire to release unclassified documents as a desire to publish documents that contain "classified" information. By referring to "The Email" and "Malware of the Mind" as "Schulte Articles" the government can now introduce statements Mr. Schulte made regarding publishing "his articles" as evidence that Mr. Schulte intended to publish "Malware of the Mind" or "The

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Email.” This despicable manipulation is not permitted. “The court may exclude relevant evidence if its probative value is substantially outweighed by a danger of... unfair prejudice, confusing the issues, [and/or] misleading the jury.” Fed. R. Evid. 403.

Mr. Schulte never mentions “The Email” in his notebooks or in prison phone calls as he completely forgot about its trivial existence. Furthermore, “The Email” predates the “Schulte Articles” by over 6 months and therefore cannot possibly be a “Schulte Article.” “Malware of the Mind” post-dates the “Schulte Articles,” and the only reference to “Malware of the Mind” is to rewrite it. Accordingly, the Court should preclude the government from confusing the issues and misleading the jury by falsifying “The Email”, “Malware of the Mind”, or any other document as a “Schulte Article” or “Article.” The only “Schulte Articles” are the unclassified redress of grievances published on presumptionofinnocence.wordpress.com.

Respectfully submitted,

Joshua Adam Schulte

Handwritten signature of Joshua Adam Schulte, consisting of two distinct cursive marks.